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ORIGINAL



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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The Air Line Pilots Association, International (ALPA) representing the professional interests of more than 58,000 pilots with 50 airlines in the United States and Canada, wishes to comment on the referenced Notice of Proposed Rulemaking.

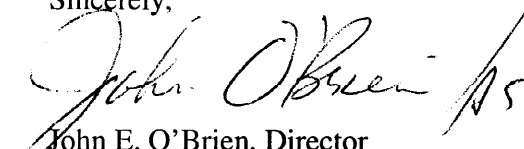
ALPA is pleased at the step the Federal Aviation Administration (FAA) is taking to extend the termination date five years for Special Federal Aviation Regulation (SFAR) No. 58. This deals with the training and qualification of aviation personnel under 14 CFR Part 121 and 135, through the use of the Advanced Qualification Program (AQP). AQP is still evolving in many air carriers and more experience is required with this program before it can be incorporated into Part 121.

In fact, in view of the many changes to the program since it was implemented, ALPA would not be surprised if it took longer than five years before rulemaking is completed. It took many drafts to produce the AQP advisory circular, which was a sign of the many different views on how the program should be implemented. As a result, the programs vary greatly. What began as innovative training has become too focused on data collection and evaluation, and crew resource management is not well integrated.

In view of the fact that FAA proposes to extend the SFAR No. 58 termination date to 2005, it is a hopeful sign that rulemaking will not be hasty. We trust that the FAA will proceed carefully while the program appears to be constantly evolving. ALPA looks forward to actively working with the FAA and the industry to achieve this overall rulemaking goal.

Thank you for the opportunity to comment.

Sincerely,


John E. O'Brien, Director
Engineering & Air Safety Department

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